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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DAN THOMPSON,

Plaintiff,

vs.

SPECIALIZED LOAN SERVICING LLC,  
TRANS UNION LLC, and EQUIFAX  
INFORMATION SERVICES LLC,

Defendants.

CASE NO. 2:20-cv-01289

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY**

**(FIRST REQUEST)**

COME NOW, the parties above named, by and through counsel, and move the Honorable Magistrate Judge for an order continuing discovery and submit the instant stipulation in accordance with LR 6-1 and LR 26-4. The parties have conferred and agree that a sixty (60)-day extension of discovery is both necessary and warranted. No previous requests or extensions for time in which to complete discovery in this matter have been requested. Good cause exists for the extension pursuant to Local Rule 26-4 as follows:

The parties are requesting a discovery extension due to scheduling conflicts that make it impossible to complete party depositions prior to the current close of discovery. This Stipulation and

1 request for extension of discovery dates is made more than twenty-one (21) days before the expiration of  
2 the deadline for discovery in this case, which is currently February 1, 2021.

3 **(a) DISCOVERY THAT HAS BEEN COMPLETED:**

4 Counsel for the respective parties participated in a discovery planning conference pursuant to  
5 Fed.R.Civ.P. 26(f). Lists of witnesses and document productions were thereafter exchanged by and  
6 between the parties.

7 Plaintiff's counsel served written discovery on Defendants, with responses due on December 18,  
8 2020.

9 Counsel for Trans Union, LLC ("TU") served written discovery on Plaintiff, with responses due  
10 on December 21, 2020.

11 Counsel for Specialized Loan Servicing, LLC ("SLS") served written discovery on Plaintiff, with  
12 responses due on December 30, 2020.

13 Plaintiff noticed the deposition of SLS's Person Most Knowledge ("PMK") under FRCP 30(b)(6)  
14 to occur on December 30, 2020. However, SLS and its counsel are not available on the noticed date and  
15 are working with Plaintiff's counsel to re-schedule the deposition for mid to late January.

16 **(b) DISCOVERY THAT REMAINS TO BE COMPLETED:**

17 The parties are currently in the process of conducting discovery. The parties will respond to each  
18 other's written discovery later this month. Additionally, Plaintiff intends to take the deposition of SLS's  
19 PMK. Defendants intend to depose Plaintiff and his spouse. The deadline for serving initial expert reports  
20 has passed with no party disclosing the same; therefore, there will be no expert discovery necessary.

21  
22 **(c) REASONS DISCOVERY WILL NOT BE COMPLETED WITHIN THE TIME  
LIMITS SET BY THE DISCOVERY PLAN:**

23 Due to the holidays and the parties' schedules, the remaining depositions cannot be completed  
24 before the discovery cutoff. Further, the parties request additional time to allow for any possible  
25 settlement negotiations to take place prior to incurring the expense of party depositions.

26 **(d) PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY:**

27 The parties hereby stipulate and request that discovery dates in this matter be continued for an  
28 additional sixty (60) days.

CURRENT DATE	PROPOSED DATE
Close of Discovery: February 1, 2021	Friday, April 2, 2021
Amend Pleadings/add parties: November 2, 2020	Passed
Expert Disclosures: December 2, 2020	Passed
Rebuttal Experts: January 4, 2021	Moot- no change requested
Dispositive Motions: March 2, 2021	Monday, May 3, 2021
Pre-Trial Order: April 1, 2021	Monday, May 31, 2021

The parties request that the Court approve the proposed extension of time as outlined above.

DATED this 15<sup>th</sup> day of December, 2020.

DATED this 15<sup>th</sup> day of December, 2020.

**GREENBERG TRAUIG, LLP**

**KIND LAW**

/s/Jacob D. Bundick

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DATED this 15<sup>th</sup> day of December, 2020.

**QUILLING, SELANDER, LOWNDS  
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**ORDER**

IT IS SO ORDERED.

DATED: December 16, 2020

  
U.S. MAGISTRATE JUDGE